

# MEMO ENDORSED

## LAW OFFICE OF AMY JANE AGNEW, P.C.

Honorable Kenneth M. Karas  
United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

May 4, 2021

### VIA ECF

**Re:** *Ceara v. Deacon, 13-cv-6023*  
*Adjournment of Status Conference*

Dear Judge Karas:

This office was approached to serve as *pro bono* counsel to Plaintiff, Rafael Ceara, in the above-referenced matter. Currently, a status conference is scheduled with the Court on May 13, 2021 at 11:00am. (Dkt. No. 143.)

Yesterday, we arranged a counsel call with the Plaintiff on May 14, 2021 at 9:30am. That was the earliest available counsel call at Green Haven Correctional Facility where Plaintiff is currently housed. We also sent via priority mail a letter of introduction as well as the relevant releases. If Plaintiff chooses to proceed with our representation, we should be able to arrange access to his medical records and related documents from Defendants in quick order. Given the need to speak with our potential client and review the relevant records, we respectfully request an adjournment of thirty (30) days. We believe this adjournment will allow us the time to arrange pro bono representation and review the record so we will be in a position to ably represent Plaintiff at any subsequent settlement conference.

I have communicated with Messrs. Horan and Shevlin at the Attorney General's Office and they have consented to the adjournment. This office is holding off on filing of a Notice of Appearance until we have been retained by Plaintiff, so we would appreciate if any resulting order could be communicated to us via email at [aj@ajagnew.com](mailto:aj@ajagnew.com) as well as via ECF.

Very truly yours,

/s/ Amy Jane Agnew

Amy Jane Agnew, Esq.

**Granted. The Court will hold a status conference  
on Friday, June 18, 2021 at 12:00 P.M.**

SO ORDERED

KENNETH M. KARAS U.S.D.J.

May 5, 2021